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MEMO ENDORSED

August 21, 2023

Via ECF

The Honorable Paul G. Gardephe
United States District Court Judge
USDC SDNY
40 Foley Square, Room 2204
New York, NY 10007

*The Conference is adjourned
to October 5, 2023 at 11:00 A.M.*

SO ORDERED:

Paul G. Gardephe

Paul G. Gardephe, U.S.D.J.
Dated: *August 21, 2023*

RE: Globe Union Industrial Corporation,

V.

Laufer Group International, Ltd.

And

Laufer Group International, Ltd.

V.

Honour Lane Shipping Ltd., Glory Bulk

Limited, Glory Bulk-China, Chipolbrok

America, Inc., and DOES 1 to 20.

23-cv-1111 (PGG)(JW)

Dear Judge Gardephe:

I am counsel for plaintiff Globe Union Industrial Corporation. I write with the consent and concurrence of counsel for defendant and third-party plaintiff Laufer Group International Ltd. ("Laufer") to make this joint

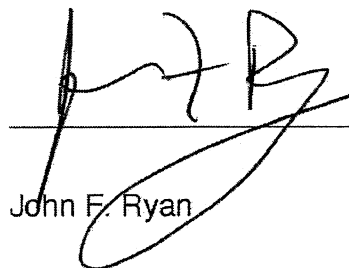
request that the Initial Conference scheduled for August 24, 2023 at 10:45 AM be adjourned to a date after September 28th at a time of the Court's convenience.

The requested adjournment of the pre-trial conference is to allow Defendant/Third-party Plaintiff's counsel the continued opportunity to perfect service of Third-party Defendants. As of this writing only one of the Third-party Defendants has contacted Mr. Lakis, counsel for Laufer, and is contemplating a requested waiver of service. Should those discussions not result in the cooperative appearance of the Third-Party Defendants, Defendant/Third -Party Plaintiff will need to intensify and make more aggressive its efforts to effect service of the third-party complaint.

It is with the foregoing in mind that counsel respectfully request that the Initial Pretrial Conference scheduled for August 24th be adjourned to a date after September 28th at a time of the Court's convenience.

We wish to thank the Court for its continued assistance.

Respectfully submitted,



John F. Ryan

CC: William E. Lakis, Esq via wlakis@lakis-law.com